

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: Only if objections are filed

Objections Due: December 5, 2024 at 4:00 p.m. (ET)

**TWENTY-THIRD MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP,
FORENSIC INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS
AND DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024**

Name of Applicant:	ALIXPARTNERS, LLP
Authorized to provide professional services to:	The Debtors and Debtors-in-Possession
Date of Retention:	January 20, 2023 <i>nunc pro tunc</i> to November 28, 2022 [Docket No. 546]
Period for which compensation and reimbursement is sought:	October 1, 2024 through October 8, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$647,476.50
80% of compensation sought as actual, reasonable and necessary:	\$517,981.20 (80% of \$647,476.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$1,740.58

This is a(n): ☒ Monthly ☐ Interim ☐ Final application

The total time expended for fee application preparation is approximately 9.0 hours and the corresponding compensation requested is approximately \$4,957.00.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

ALIXPARTNERS, LLP

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed; Docket No.	Period	Requested		Paid		Certificate of No Objection	Amount Outstanding
		Fees	Expenses	Fees	Expenses		
02/07/2023 Docket #645	11/28/2022 - 12/31/2022	\$ 1,103,379.25	\$ 21,288.04	\$ 1,103,379.25	\$ 21,288.04	02/28/2023 Docket #780	\$ -
03/06/2023 Docket #816	01/01/2023 - 01/31/2023	2,114,603.25	9,074.28	2,074,632.17	9,074.28	03/17/2023 Docket #1116	39,971.08
04/04/2023 Docket #1220	02/01/2023 - 02/28/2023	3,003,579.25	4,991.04	3,003,579.25	4,991.04	04/25/2023 Docket #1346	-
05/01/2023 Docket #1397	03/01/2023 - 03/31/2023	4,444,875.00	72,285.60	4,444,875.00	72,285.60	05/01/2023 Docket #1397	-
06/02/2023 Docket #1560	04/01/2023 - 04/30/2023	4,849,966.75	43,924.43	4,639,966.75	28,924.43	06/26/2023 Docket #1717	225,000.00
06/30/2023 Docket #1820	05/01/2023 - 05/31/2023	5,122,984.75	52,672.11	5,122,984.75	52,672.11	07/21/2023 Docket #1893	-
07/31/2023 Docket #2099	06/01/2023 - 06/30/2023	5,053,953.75	46,599.88	5,053,953.75	46,599.88	08/24/2023 Docket #2242	-
8/30/2023 Docket #2274	07/01/2023 - 07/31/2023	4,196,327.75	114,059.80	3,762,635.60	114,059.80	09/20/2023 Docket #2653	433,692.15
9/29/2023 Docket #2774	08/01/2023 - 08/31/2023	4,607,471.00	79,925.05	4,225,639.08	18,444.76	10/20/2023 Docket #3327	443,312.21
10/31/2023 Docket #3633	09/01/2023 - 09/30/2023	4,129,430.50	56,064.99	4,129,430.50	56,064.99	11/30/2023 Docket #4433	-
11/29/2023 Docket #4206	10/01/2023 - 10/31/2023	4,573,717.75	51,619.12	4,573,717.75	51,619.12	12/20/2023 Docket #4932	-
12/22/2023 Docket #5100	11/01/2023 - 11/30/2023	3,464,556.50	67,893.53	3,277,570.12	43,694.83	01/12/2024 Docket #5689	211,185.08
01/31/2024 Docket #6852	12/01/2023 - 12/31/2023	2,281,171.00	3,123.18	2,281,171.00	3,123.18	02/21/2024 Docket #7711	-
02/29/2024 Docket #8303	01/01/2024 - 01/31/2024	2,750,336.50	6,663.90	2,750,336.50	6,663.90	03/21/2024 Docket #10100	-
03/28/2024 Docket #10659	02/01/2024 - 02/29/2024	2,434,885.75	5,968.76	2,434,885.75	5,968.76	04/18/2024 Docket #12248	-
04/26/2024 Docket #10659	03/01/2024 - 03/31/2024	2,126,550.75	13,531.36	2,126,550.75	13,531.36	05/17/2024 Docket #15143	-
05/31/2024 Docket #16372	04/01/2024 - 04/30/2024	2,062,319.50	64,990.30	1,954,209.87	52,130.57	06/21/2024 Docket #18411	120,969.36
6/14/2024 Docket #17659	04/01/2024 - 04/30/2024		2,790.59		2,790.59		-
06/28/2024 Docket #19158	05/01/2024 - 05/31/2024	2,210,330.00	36,570.21	1,768,264.00	36,570.21	07/22/2024 Docket #20998	442,066.00
07/26/2024 Docket #21725	06/01/2024 - 06/30/2024	1,661,925.00	952.26	1,329,540.00	952.26	08/14/2024 Docket #22979	332,385.00
08/29/2024 Docket #24024	07/01/2024 - 07/31/2024	1,962,393.00	2,885.73	1,569,914.40	2,885.73	09/19/2024 Docket #25284	392,478.60

ALIXPARTNERS, LLP**SUMMARY OF MONTHLY FEE STATEMENTS**

Date Filed; Docket No.	Period	Requested		Paid		Certificate of No Objection	Amount Outstanding
		Fees	Expenses	Fees	Expenses		
10/31/2024 Docket #26056	09/01/2024 - 09/30/2024	2,130,097.00	42,109.41				2,172,206.41
10/14/2024 Docket #N/A	10/01/2024 - 10/08/2024	647,476.50	1,740.58				649,217.08
Subtotal		\$ 66,932,330.50	\$ 801,724.15	\$ 61,627,236.24	\$ 644,335.44		\$ 5,462,482.97
Less Voluntary Reduction ¹		(39,971.08)					(39,971.08)
Less Voluntary Reduction ²		(210,000.00)	(15,000.00)				(225,000.00)
Less Voluntary Reduction ³		(380,669.79)	(53,022.36)				(433,692.15)
Less Voluntary Reduction ⁴		(381,831.92)	(61,480.29)				(443,312.21)
Less Voluntary Reduction ⁵		(186,986.38)	(24,198.70)				(211,185.08)
Less Voluntary Reduction ⁶		(108,109.63)	(12,859.73)				(120,969.36)
Total		\$ 65,624,761.70	\$ 635,163.07	\$ 61,627,236.24	\$ 644,335.44		\$ 3,988,353.09

¹ This voluntary reduction refers to reduced fees that AlixPartners agreed upon with the Fee Examiner during the First Interim Period.

² This voluntary reduction refers to reduced fees and expenses that AlixPartners agreed upon with the Fee Examiner during the Third Interim Period.

³ This voluntary reduction refers to reduced fees and expenses that AlixPartners agreed upon with the Fee Examiner during the Third Interim Period.

⁴ This voluntary reduction refers to reduced fees and expenses that AlixPartners agreed upon with the Fee Examiner during the Fourth Interim Period.

⁵ This voluntary reduction refers to reduced fees and expenses that AlixPartners agreed upon with the Fee Examiner during the Fifth Interim Period.

⁶ This voluntary reduction refers to reduced fees and expenses that AlixPartners agreed upon with the Fee Examiner during the Sixth Interim Period.

ALIXPARTNERS, LLP**SUMMARY OF HOURS AND FEES BY PROFESSIONALS
OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024**

Professional	Title	Rate	Hours	Fees
Matthew Evans	Partner & Managing Director	\$1,410	4.1	\$ 5,781.00
Charles Cipione	Partner & Managing Director	\$1,320	6.3	8,316.00
David J White	Partner & Managing Director	\$1,225	11.6	14,210.00
Anne Vanderkamp	Partner	\$1,200	38.7	46,440.00
John C LaBella	Partner	\$1,200	27.5	33,000.00
Lilly M Goldman	Partner	\$1,200	10.1	12,120.00
Thomas Hofner	Partner	\$1,200	20.9	25,080.00
Todd Toaso	Partner	\$1,200	19.1	22,920.00
Mark Cervi	Director	\$1,125	3.8	4,275.00
Travis Phelan	Director	\$1,025	45.8	46,945.00
Bennett F Mackay	Director	\$960	38.9	37,344.00
Kurt H Wessel	Director	\$960	27.1	26,016.00
Ganesh Gopalakrishnan	Senior Vice President	\$950	46.9	44,555.00
Lewis Beischer	Senior Vice President	\$880	43.7	38,456.00
Matthew Birtwell	Senior Vice President	\$880	42.9	37,752.00
Ryan Griffith	Senior Vice President	\$880	31.5	27,720.00
Takahiro Yamada	Senior Vice President	\$880	5.5	4,840.00
Di Liang	Senior Vice President	\$825	39.7	32,752.50
Jeffrey R Berg	Senior Vice President	\$825	39.5	32,587.50
Ryan Backus	Vice President	\$770	7.7	5,929.00
Chi Chen	Vice President	\$750	6.9	5,175.00
Randi Self	Vice President	\$750	42.5	31,875.00
Allyson Calhoun	Vice President	\$640	20.6	13,184.00

ALIXPARTNERS, LLP**SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024**

Professional	Title	Rate	Hours	Fees
Linna Jia	Vice President	\$640	12.3	7,872.00
Sean Thompson	Vice President	\$640	2.7	1,728.00
Lisa Marie Bonito	Vice President	\$550	7.6	4,180.00
Griffin Shapiro	Consultant	\$555	42.7	23,698.50
Jason Chin	Consultant	\$555	48.9	27,139.50
Olivia Braat	Consultant	\$555	35.8	19,869.00
Shengjia Kang	Consultant	\$555	10.3	5,716.50
Total Hours and Fees for Professionals			741.6	\$ 647,476.50
Less 20% Holdback				(129,495.30)
Total Fees for Professionals Less Holdback				\$ 517,981.20

Average Billing Rate \$ 873.08

ALIXPARTNERS, LLP**SUMMARY OF HOURS AND FEES BY MATTER CATEGORY¹
OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024**

Code	Matter Category	Hours	Fees
1.1	Chapter 11 Process / Case Management	-	-
1.2	Communication & Meetings with Interested Parties	21.3	\$ 23,499.00
1.3	Communication with Regulatory Parties	-	-
1.4	U.S. Trustee / Court Reporting Requirements	-	-
1.5	Forensic Analysis	-	-
1.6	Document Review	-	-
1.7	Interviews	-	-
1.8	Public Data & Research	3.8	2,109.00
1.9	Claims Process	-	-
1.10	eDiscovery	-	-
1.11	Reporting & Presentation of Findings	-	-
1.12	Preparation for / Attend Court Hearings	-	-
1.13	Retention Applications & Relationship Disclosures	-	-
1.14	Fee Statements & Fee Applications	9.0	4,957.00
1.15	Financial Statement Reconstruction	285.6	246,809.00
1.16	Special Investigations	15.8	11,822.00
1.17	Solvency Analysis	-	-
1.20	Avoidance Actions	406.1	358,280.50
1.31	Travel Time	-	-
Total Hours and Fees by Matter Category Before Holdback		741.6	\$ 647,476.50

Average Billing Rate \$ 873.08

¹ The subject matter of certain time entries may be appropriate for more than one matter category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES

OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024

Expense Category	Amount
Client Research	\$ 1,740.58
Total Expenses	\$ 1,740.58

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: Only if objections are filed

Objections Due: December 5, 2024 at 4:00 p.m. (ET)

**TWENTY-THIRD MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FORENSIC
INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS AND
DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 8, 2024**

AlixPartners, LLP (“AlixPartners”), as forensic investigation consultant to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), hereby submits its twenty-third monthly fee statement (the “Monthly Fee Statement”) for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from October 1, 2024 through October 8, 2024 (the “Fee Period”). AlixPartners respectfully states as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

3. The bases for the relief requested herein are Sections 330 and 331 of Title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the *Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware* (the “Local Rules”), the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 435] (the “Interim Compensation Order”).

Background

4. On November 11 and November 14, 2022 (as applicable, the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned chapter 11 cases (the “Chapter 11 Cases”) in this Court.

5. Joint administration of the Chapter 11 Cases was authorized by the Court by entry of an order on November 22, 2022 [Docket No. 128].

6. No trustee has been appointed in these Chapter 11 Cases.

7. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 231].

8. On December 21, 2022, the Debtors filed their *Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors Nunc Pro Tunc to November 28, 2022* [Docket No. 277].

9. On January 20, 2023, the Court entered the *Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors Nunc Pro Tunc to November 28, 2022* [Docket No. 546] (the “Retention Order”).

10. The Retention Order approved the terms of AlixPartners’ hourly fee and expense structure set forth in the engagement letter dated November 28, 2022 (the “Engagement Letter”) and authorized AlixPartners to be compensated and reimbursed pursuant to section 327 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, U.S. Trustee Guidelines and the Interim Compensation Order, and any other applicable orders of this Court.

11. As set forth in the Engagement Letter, AlixPartners’ standard hourly rates are reviewed annually and certain professionals’ rates were adjusted as of January 1, 2024 and July 31, 2024, which included reasonable, routine, across-the-board rate increases to reflect promotions and general market increases. At the end of each calendar year, AlixPartners evaluates the appropriate hourly billing rate for its professionals in each of its service offerings, when compared to market of comparable firms performing similar services.

12. Pursuant to the Engagement Letter, Matthew Evans is the Partner & Managing Director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.

13. The Interim Compensation Order provides that upon the expiration of the objection deadline (the “Objection Deadline”), a professional may file a certificate of no objection (a “CNO”) with the Court with respect to any professional fees and out-of-pocket expenses not subject to objection. After a professional files a CNO, the Debtors are authorized to pay the professional 80% of the fees and 100% of the expenses not subject to an objection that are requested in the applicable

Monthly Fee Application.

14. On March 8, 2023, the Court entered the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [Docket No. 834] appointing Katherine Sadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

15. On February 27, 2024, the Court entered the *Order Approving Appointment of Examiner* [Docket No. 9882] appointing Robert J. Cleary (the “Examiner”) to serve as the examiner in these Chapter 11 Cases.

Fees and Expenses During the Fee Period

16. During the Fee Period, AlixPartners provided an aggregate of 741.6 hours of professional services in the amount of \$647,476.50 and incurred out-of-pocket expenses in the amount of \$1,740.58. After applying a 20% holdback of fees in the amount of \$129,495.30, AlixPartners seeks payment of 80% of fees for services rendered in the amount of \$517,981.20 and 100% of expenses incurred in the amount of \$1,740.58, for a total payment of \$519,721.78 during the Fee Period.

17. A detailed itemization, by matter category, of all services performed by AlixPartners with respect to the Chapter 11 Cases during the Fee Period is attached hereto as **Exhibit A**. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified. All services for which AlixPartners requests compensation were performed for, or on behalf of, the Debtors.

18. A detailed list of the out-of-pocket expenses incurred during the Fee Period are attached hereto as **Exhibit B**.

19. In accordance with section 330 of the Bankruptcy Code, AlixPartners seeks reimbursement only for the actual cost of such expenses to AlixPartners. AlixPartners submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

Summary of Services Rendered During the Fee Period

20. During the Fee Period, AlixPartners has conducted investigative inquiries and assisted the Debtors with (i) communications and meetings with stakeholders and their representatives; (ii) engaging in forensic analysis of financial and accounting data, trading records, and other associated data to determine intercompany loans, conduct liability analyses, and aid asset recovery efforts; (iii) reviewing and analyzing the Debtors' historical organizational documents, policies and procedures, and internal electronic communications; (iv) researching into public data of crypto markets, asset pricing, and other information regarding crypto exchanges and market participants; (v) collecting and structuring financial and accounting data to aid with forensic investigation efforts; (vi) preparing summaries from forensic investigation efforts aimed at asset recovery; and (vii) analyzing available structured and unstructured financial data to support construction of historical quarterly financial data for the Debtor entities.

Services By Category Provided During the Fee Period

21. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Debtors during the Fee Period.

Matter Code 1.2: Communication & Meetings with Interested Parties

21.3 hours - \$23,499.00

- Met and communicated with, and prepared summaries for, various other Debtors' professionals and/or their advisors, the U.S. Trustee, and other parties of interest

Matter Code 1.8: Public Data & Research

3.8 hours - \$2,109.00

- Obtained, reviewed and analyzed publicly available data sources including but not limited to crypto markets, asset pricing, trading volume, case dockets, contract specifications and information regarding crypto exchanges and market participants

Matter Code 1.14: Fee Statements & Fee Applications

9.0 hours - \$4,957.00

- Begin the Twenty-Second Monthly Fee Statement for the period from September 1, 2024 through September 30, 2024, including its supporting schedules and exhibits
- Managed the fee application process in accordance with requirements of the U.S. Trustee and/or the Court

Matter Code 1.15: Financial Statement Reconstruction

285.6 hours - \$246,809.00

- Identified and analyzed digital assets by legal entity to determine deficiencies, corrections and appropriate treatment
- Researched and analyzed smart contract transactions resulting in DeFi positions to identify and quantify debtor digital assets and liabilities
- Analyzed historical digital asset pricing

Matter Code 1.16: Special Investigations

15.8 hours - \$11,822.00

- Managed resources and investigative efforts in support of special investigation requests from regulatory agencies, Debtors' counsel and other stakeholders
- Performed analysis to address special investigation requests from regulatory agencies, Debtors' counsel and other stakeholders
- Performed analysis in support of Debtors' causes of actions

Matter Code 1.20: Avoidance Actions

406.1 hours - \$358,280.50

- Prepared draft expert reports summarizing the process for preparing historical financial statements and the identification and pricing of crypto assets
- Performed quality control of reconstructed historical financial statements for the purpose of draft expert reports
- Prepared data utilized for historical financial statement reconstruction for production in avoidance actions
- Assisted counsel with discovery requests

- Performed analyses from the reconstructed historical financial statements for purposes of evaluating potential avoidance actions and other legal actions at the request of counsel

22. AlixPartners believes that the fees and out-of-pocket expenses requested are reasonable, actual and for necessary services rendered or expenses incurred on behalf of the Debtors during the Fee Period.

23. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

Certification

24. A Certification of Matthew Evans is attached hereto as **Exhibit C** and incorporated herein. Matthew Evans certifies that he has reviewed the requirements of Local Rule 2016-2 and that the Monthly Fee Statement substantially complies with such rule.

Notice and No Prior Request

25. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors; and (c) all parties required to be given notice in the Interim Compensation Order. AlixPartners submits that no other or further notice is necessary.

26. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

Conclusion

WHEREFORE, AlixPartners, as forensic investigation consultant to the Debtors, respectfully requests: (i) an interim allowance of compensation for professional services in the amount of \$647,476.50 and reimbursement of out-of-pocket expenses in the amount of \$1,740.58 for the Fee Period; (ii) that, upon the expiration of the Objection Deadline and entry of a CNO, the Debtors are authorized to pay AlixPartners fees in the amount of \$517,981.20 (80% of \$647,476.50) and 100% of out-of-pocket expenses in the amount of \$1,740.58, for a total amount of \$519,721.78; and (iii) such other and further relief as this Court deems proper.

Dated: November 15, 2024

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ Matthew Evans

By: Matthew Evans
Partner & Managing Director